

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

ELVIS MOODIE, RAYON FISHER,)	
DESMOND ELLIS, and)	
KEISHA COLLINS-ENNIS, on behalf of)	
themselves and all others similarly situated,)	
)	Case No. 2:15-cv-01097-RMG
Plaintiffs,)	
)	
v.)	
)	
KIAWAH ISLAND INN COMPANY, LLC,)	
d/b/a KIAWAH ISLAND GOLF RESORT,)	
)	
Defendant.)	
	-)	

DECLARATION OF SUSAN K. DUNN

I, Susan K. Dunn, make this Declaration pursuant to 28 U.S.C. § 1746. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

1. I have no personal interest in this case nor in the petition for attorneys' fees.
2. I received my J.D. from the University of North Carolina School of Law in 1977, and received a B.A. in English and Religion from Duke University in 1972. I received an Angier B. Duke Merit Scholarship.
3. I was an associate with Shimel, Ackerman, Theos and Spar in Charleston, S.C. from 1977 until 1982. I was in partnership with Lee Robinson as Dunn and Robinson from 1982 until 1985. I was a sole practitioner in Charleston, SC from 1985 until 2009. I have worked full time as an attorney with the ACLU or the ACLU of SC since January of 2009.

4. I was admitted to the state bars of South Carolina in 1977, as well as the bar for the U.S. Court of Appeals for the Fourth Circuit. I have also been admitted *pro hac vice* to practice in the U.S. District Court of the District of Columbia.
5. I have served as counsel on numerous cases before the United States District Court of South Carolina. *See Ferguson, et. al. v. City of Charleston, et. al.* (4th amendment case ultimately heard by the US Supreme Court, 532 US 67, 121 S.Ct. 2001); *Lowcountry Immigration Coalition v. Haley, et. al.*, No. . 2:11-cv-02779 (challenge to SC immigration law, SB20); *Anderson, et. al. v. Chesterfield County School District*, No. 4:11-cv-03300 (establishment clause case); and *Prison Legal News, et.al. v. Berkeley County Sheriff, et. al.* (prison mail case), 2:10-cv-02594. I also served as one of the counsel for the intervenors in *State of SC v. U.S.A.*, No. No. 1:12-cv-00203 (challenge to SC voter ID legislation) before the United States District Court for the District of Columbia.
6. I am generally familiar with local billing rates as I regularly litigate civil rights cases under statutes that provide for attorneys' fees awards for successful plaintiffs.
7. I have reviewed the hourly rates proposed by the Southern Poverty Law Center and Bloodgood & Sanders, LLC (Nancy Bloodgood and James Knoepp, who have practiced 33 years and 18 years, respectively, \$425.00; Michelle Lapointe, who has practiced 8 years, \$375.00; Sarah Rich, who has practiced 5 years, \$275.00, and paralegals, \$100.00).
8. Based on my knowledge of the hourly rates in the Charleston market and of the attorneys' years of legal experience, I find these rates to be consistent with those rates charged by Charleston attorneys and paralegals with similar expertise.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed at Charleston, South Carolina on December 5th, 2016.



Susan K. Dunn